

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE RESPONSE
TO DAVID B. POPKIN INTERROGATORY
(DBP/USPS—24)
(June 21, 2012)**

The United States Postal Service files its responses to the above-listed interrogatories of David B. Popkin, dated December 28, 2011. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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RESPONSE OF UNITED STATES POSTAL SERVICE
TO DAVID B. POPKIN INTERROGATORY

DBP/USPS-24 Please refer to your response to Interrogatory DBP/USPS-11.

[a] Please advise the specific part of the response to Interrogatory DBP/USPS-30 in Docket N2010-1 that responds to Interrogatory DBP/USPS-11 in this Docket.

[b] Please provide the number of facilities that have City Delivery Service.

[c] Please provide the number of facilities that have Rural Delivery Service.

[d] Please provide the number of facilities that have Contract Delivery Service.

Note: A given facility may appear in more than one listing.

[e] Approximately what percentage of facilities that have City Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on weekdays?

[f] Approximately what percentage of facilities that have City Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on Saturdays?

[g] Approximately what percentage of facilities that have Rural Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on weekdays?

[h] Approximately what percentage of facilities that have Rural Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on Saturdays?

[i] Approximately what percentage of facilities that have Contract Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on weekdays?

[j] Approximately what percentage of facilities that have Contract Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on Saturdays?

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RESPONSE

[a] The response to interrogatory DPB/USPS—11 should not refer to the response to interrogatory DBP/USPS—30. It is not possible to determine which exact facilities by type of delivery service may experience a situation as described in DBP/USPS-11, where mail collected by a carrier on a given day will not be dispatched to the processing center for processing with Day-0 measured on the day the carrier collected the mail from the customer.

[b-d] The information requested is not available through currently available database information.

[e-j] As has been described in previous interrogatory responses, there are various reasons, primarily temporary in nature, which could impact carrier operations and the return time of the carrier. In many cases, any such mail is taken directly to a later dispatching location or to the plant for processing on the same day utilizing a local policy or process. It is not possible to provide an accurate estimate of the percentage of Post Offices impacted as described in the scenario presented in this part.